

ReedSmith

Driving progress
through partnership

Rebecca R. Hanson

Direct Phone: +1 312 207 2831

Email: rhanson@reedsmith.com

Samuel Kadosh

Direct Phone: +1 212 549 0451

Email: skadosh@reedsmith.com

Reed Smith LLP
10 South Wacker Drive
Chicago, IL 60606-7507
+1 312 207 1000
Fax +1 312 207 6400

Reed Smith LLP
599 Lexington Avenue
New York, NY 10022-7650
+1 212 521 5400
Fax +1 212 521 5450
reedsmith.com


November 29, 2022

VIA ECF

The Honorable Paul A. Crotty
United States District Court
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

12/9/2022

The requested sealing of portions
of the SJ motion are granted. SO
ORDERED.



Re: *E.V. v. Oxford Health Plans (NY), Inc. ("Oxford")*, erroneously sued as United Healthcare Oxford, and United Behavioral Health ("UBH") (collectively, "United"), S.D.N.Y., No. 1:22-CV-02855-PAC

Dear Judge Crotty:

We represent Defendants Oxford Health Plans (NY), Inc. ("Oxford"), erroneously sued as United Healthcare Oxford, and United Behavioral Health ("UBH") (collectively, "United") in the above-referenced matter. Pursuant to the Court's Individual Motion Practices and Rules, United writes to request sealing of certain portions of its Motion for Summary Judgment ("Motion") and accompanying exhibits. The aforementioned Motion is being filed contemporaneously with proposed redactions.

United's Motion quotes or paraphrases information that United has determined to be designated as Confidential pursuant to the Stipulated Confidentiality Agreement and Protective Order ("Protective Order") in this matter. (Dkt. #45). Specifically, United's Motion and Statement of Material Facts contain Protected Health Information and Individually Identifiable Information, which are protected by HIPAA and are deemed Confidential under Section 2 of the Protective Order. Exhibit A contains documents that constitute Defendants' confidential and proprietary business information and have been marked as Attorney's Eyes Only pursuant to the Protective Order, and therefore should remain wholly under seal.

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As such, United respectfully requests that the redactions in its Motion remain under seal. United thanks the Court for its consideration of this request.

Respectfully submitted,

/s/ Samuel Kadosh
Samuel Kadosh
Rebecca R. Hanson

cc: Counsel of Record (*via CM/ECF*)